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Environmental Protection Division
Hazardous Waste Management Branch
Attention: David Yardumian
205 Butler Street SE
Suite 1154 East
Atlanta, GA 30334



RE: General Electric's Creek Bank Soil Removal Work Plan

The Coosa River Basin Initiative (CRBI), a non-profit environmental advocacy organization based in Rome, Georgia, would like to voice a few concerns about General Electric's Creek Bank Soil Removal Work Plan. We understand that the soil removal is a voluntary action on the part of General Electric, and we support their efforts to remove contaminated soils in Rome. We do, however, want to ensure that their cleanup is complete and is protective of human health and the environment.

CRBI's primary concerns surround the horizontal and vertical extent of the contaminated soil removal. The current Work Plan seeks to remove contaminated soil from three locations on Horseleg Creek and Little Dry Creek, but each transect only removes soil from one side of the creek bank. After a quick review of earlier PCB sampling efforts by GE, EPD, and EPA, CRBI has discovered that PCBs have been found in the creek bed and both sides of the creek in the areas of the transects. More sampling needs to be conducted in order to fully understand the extent of this contamination. If soils are found with PCB concentrations above 1.55 ppm, General Electric should remove these soils.

CRBI is also concerned that contaminated soils below the groundwater table will be left in the ground if soil removal occurs before the groundwater table has subsided to a low summer level. Additionally, although General Electric proposes to collect additional samples if contaminated soils appear to be below the water table, General Electric does not guarantee that they will remove these soils. General Electric should remove all contaminated soils above the 1.55 ppm level regardless of whether they are above or below the water table. Leaving any contaminated soils, especially those in contact with groundwater, will continue to pose a health risk to the community.

Thank you for taking the time to consider these concerns.

Sincerely,

Emily Goodwin
Emily Goodwin

